

## REMARKS

Applicant thanks the Examiner for carefully reviewing the application and acknowledges that claims 9-14 are allowed. Further, Applicant acknowledges that claims 3, 4, 7, 8 and 16-20 were indicated to be allowable if rewritten in independent form to include all of the limitations of the base claim and any intervening claims. Accordingly, Applicant adds new independent claims 21-24. No new matter is added by way of the new independent claims, which are fully supported by the specification. Claims 1-8 and 15-24 remain pending.

### Rejection under 35 U.S.C. § 102(b)

The Examiner rejected claims 1, 5, 6 and 15 as being anticipated by Pant et al. (U.S. Pat. No. 5,916, 012). Applicant respectfully traverses.

Pant et al. discloses an insert 38 having openings 43 that “correspond to reside *atop* the channels 41 (col. 7, lines 48-50)” in a platen 25b. Moreover, in addition to the channels 41, the platen 25b has *one recess along the outer edge* of the platen 25 to fit a circular insert “*atop* platen 25b in order to *cover the channels* 41 (col. 7 lines 42-48).” Thus, Pant et al. discloses *two objects*, one being a platen and the other being a platen insert, such that the platen insert *covers* the platen *using one recess along the periphery* of the platen.

In contrast, independent claim 1 recites “...a *platen plate* having *at least one recess defined therein...a porous material disposed in the at least one recess...*” Similarly, independent claim 15 recites “...a portion of the *platen being formed of a porous material...*” Accordingly, the independent claims recite porous material disposed in a recess on the platen. Because Pant et al. discloses and therefore teaches a platen insert that sits *atop* the platen instead of a platen insert that is *disposed in* the channels, Pant et al. does

not teach each and every element recited by independent claims 1 and 15. Thus, Applicant respectfully requests withdrawal of the 35 U.S.C. § 102(b) rejection regarding independent claims 1 and 15. Further, because independent claims 1 and 15 are allowable, dependent claims 5 and 6 are allowable for the same reasons.

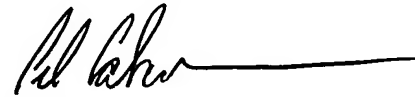
**Rejection under 35 U.S.C. § 103(a)**

The Examiner also rejected dependent claim 2 under 35 U.S.C. § 103(a) as being unpatentable over Pant et al. Applicant respectfully traverses.

Applicant respectfully submits that independent claim 1 is allowable. Regarding the dependent claims, because dependent claim 2 depends from independent claim 1, dependent claim 2 is allowable for the same reasons. Specifically, because Pant et al. does not teach one of ordinary skill in the art how to dispose porous material in a recess of a platen, Pant et al. cannot teach or suggest how to determine the composition of the porous material. Further, one of ordinary skill in the art would not be motivated to *dispose porous material with a particular composition in a platen* because Pant et al. suggests *covering the platen with an insert plate*. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. § 103(a) rejection and the issuance of a Notice of Allowance.

Applicant notes the references cited by the Examiner. However, the references are not pertinent because they do not disclose each and every element recited by the Applicant's claims. If the Examiner has any questions, please contact the undersigned at (408) 749-6900, ext. 6911. Further, if any fees are due in connection with filing this amendment, the Commissioner is authorized to charge Deposit Account No. 50-0805 (Order No. LAM2P310). A copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
MARTINE & PENILLA, LLP

A handwritten signature in black ink, appearing to read 'Feb Cabrasawan', followed by a long horizontal line extending to the right.

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